

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Basim Sabri, Marty Schulenberg, Mohamed
Cali, Jay Webb, and Zachary Metoyer,

Plaintiffs,

Court File No. 15-CV-01578 (ADM/SER)

vs.

AFFIDAVIT OF MAHAMED A. CALI

City of Minneapolis, a municipal corporation,
and the Whittier Alliance, a Minnesota
not-for-profit corporation,

Defendants.

STATE OF MINNESOTA)
)SS
COUNTY OF HENNEPIN)

Mahamed A. Cali, being first duly sworn, states and alleges as follows:

1. I am one of the Plaintiffs in the above-entitled matter.
2. I have been advised that Defendant Whittier Alliance claims that the reason I was disqualified from running for the board of directors in March 2014 is that I failed to provide proof that I owned a business in the Whittier Alliance neighborhood.
3. That assertion is blatantly false.
4. I was the owner of a coffee shop named Sharfo Tea and Talk from Sept. 27 to January, 2015 located at 312 West Lake St., Minneapolis, MN 55408. Said coffee shop is located in Whittier Alliance neighborhood.
5. I am also the executive director of a nonprofit business called Somali American Community from 2009 until the present located at 2910 Pillsbury Ave. S., #220,

Minneapolis, MN 55408. Said nonprofit business is located in the Whittier Alliance neighborhood.

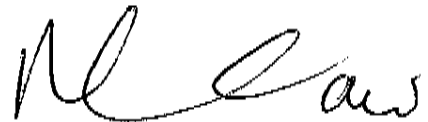
6. Defendant Whittier Alliance was fully aware of my ownership of these businesses by the beginning of March 2014.
7. Prior to that time, I hosted three separate meetings in the conference room at the business office for Somali American Community concerning an attempt to improve relations between Somali-American businesses and the Whittier Alliance.
8. Marian Biehn, executive director of Whittier attended all three meetings.
9. Then Minneapolis City Council Member Robert Lilligren attended all three meetings as well.
10. In addition, prior to 2014, I worked with Whittier Alliance to organize a petition signature drive for a traffic semaphore at Lake Street and Pillsbury Ave. South.
11. As executive directors for our respective nonprofits, Marian Biehn and I worked together to apply for a grant from The Center for Urban and Regional Affairs ("CURA") at the University of Minnesota for youth sports activities. This occurred in November 2012. A requirement of the grant was that the Somali-American Community work with Whittier to apply. The grant was denied because Whittier proposed charging a fiscal agent fee of more than any other neighborhood organization.
12. In the several months before the March 2014 Whittier annual election I, along with Plaintiffs Marty Schulenberg, Jay Webb, and Zachary Metoyer, and Roble Jama worked together to collect signatures from Somali-American businesses in Whittier neighborhood for the purpose of inclusion in the business directory of Whittier. True

and correct copies of the signatures gathered from this collective effort are attached hereto as Exhibit A.

13. With respect to each page of signatures, we attached copies of either current business licenses, state sales tax number and/or federal 501(c)(3) status confirmation letter as well as a lease for each business.
14. The purpose of collecting this information and presenting it to Whittier was because we had numerous complaints from Somali-American businesses that they were unable to get included in the Whittier Alliance Business Directory. Inclusion in the Business Directory grants automatic membership status in Whittier under its bylaws.
15. It was my idea as executive director of the Somali American Community to reach out to business owners in the Somali American Community and to inform them of the Whittier Alliance, explain to them their right to be a member of Whittier as a business owner and the benefits that we hoped as a heretofore unrepresented ethnic community to gain from membership.
16. In 2010 I ran to be a member of the Whittier board of directors and lost. However, there was no question in that election of my qualifications to run for the position. It was the same position that Whittier now says I was disqualified for in the 2014 election.
17. I attempted to run for the Whittier Alliance Board of Directors in March of 2014 and was prevented from running because the incumbent board found that I had not been sufficiently active in the Whittier Alliance to run for the board, notwithstanding the activities above mentioned; notwithstanding the fact that I had been permitted to run

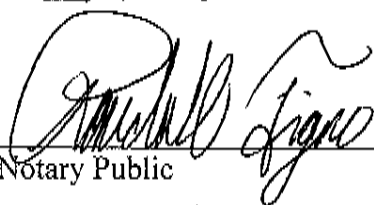
four years earlier; and notwithstanding the fact that nothing in the existing bylaws contained such a requirement.

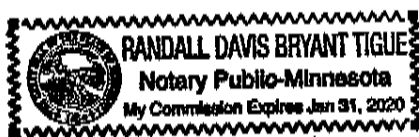
18. After I unsuccessfully presented a grievance protesting this exclusion, Defendant Whittier Alliance amended its bylaws to exclude from running for the Board of Directors anyone who has "committed an act of malice or defamation against Whittier Alliance or any member of its Board of Directors or otherwise disrupted the aims and purposes of the corporation."
19. I immediately recognized this provision as having been inserted for the sole purpose of preventing me, the other Plaintiffs, and people critical of the racist policies of the incumbent board and executive director from running.
20. Had it not been for this bylaw provision, I would have run for the Whittier Alliance Board of Directors in 2015.
21. I execute this affidavit in opposition to Defendants' motion to dismiss Plaintiffs' complaint and in support of Plaintiffs' motion for preliminary injunction.



Mahamed Cali

Sworn to and subscribed before me
this 20th day of April, 2015.



Notary Public

We, the undersigned Karmel Plaza and Karmel Square tenants located at 2910 Pillsbury Ave. and 2936-44 Pillsbury Ave., wish to become voting members of Whittier Alliance by having our name listed in the Whittier Alliance business directory pursuant to Section 3C of the Whittier Alliance Bylaws. Upon your request we can also provide you with a copy of our lease agreement showing that our business is in the Whittier neighborhood.

Name of Tenant/Business	Address	Type of Business	Phone Number	Signature
Sadiq Ali	2910 Pillsbury	Restaurant	661-818-7215	Sadiq Ali
Paul M. G.	2910 Pillsbury	Romance	612-827-3718	Paul M. G.
Mis B. G.	2910 Pillsbury	Animal Pet	612-856-5757	Mis B. G.
Calva Kaniwa	2910 Pillsbury	Bar & Grill	612-205-2113	Calva Kaniwa
MARIAN SIYARD	2910 Pillsbury	DOUGH STORE	263-267-3335	MARIAN SIYARD
Alfred Sadi	2910 Pillsbury	Ad's Perfumes	612-532-5417	Alfred Sadi
Neelika H. H.	2910 Pillsbury	Lucky Star	612-229-4715	Neelika H. H.
ANAD E. HIRASI	2910 Pillsbury	SUNSHINE SEWING	612-547-8877	ANAD E. HIRASI
MAGTOMAGMUD	2910 Pillsbury	Humanitarian	612-825-1609	MAGTOMAGMUD
A. D. W. R. H.	2910 Pillsbury	TRAY COFFEE	763-142-6669	A. D. W. R. H.
	2910 Pillsbury	Quarlow Restaurant	763-142-6669	
	2910 Pillsbury	Quarlow REST STOP		
DAHABO IDARES	2910 Pillsbury	Liberal Store	952-649-7017	DAHABO IDARES
HASAN ALI	2910 Pillsbury	SUBBA COFFEE	612-667-0314	HASAN ALI
ISRAEL S. S.	2910 Pillsbury	ISRAEL S. S.		ISRAEL S. S.
AMINAH MAX	2910 Pillsbury	ISRAEL S. S.	612-644-6101	AMINAH MAX
KATOUNA NAHAMA	2910 Pillsbury	ISRAEL S. S.	612-245-5081	KATOUNA NAHAMA
KADBA FARAH	2910 Pillsbury	POWERS STORE	612-483-9578	KADBA FARAH
AYAN FARAH	2910 Pillsbury	STORE 153	612-642-9221	AYAN FARAH
SATIA BAREND	2910 Pillsbury	MATANAH	612-501-7362	SATIA BAREND
ALBERT	2910 Pillsbury	COBLEN TAILOR	612-735-3202	ALBERT

Bourbon Market

148
153
159

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	Name of Tenant/Business	Address	Type of Business	Phone Number	Signature
+157	ASAN	2910 Pillsbury	AL-KOWSEER STORE	324 310 7668	DA H H B O
	Hous Omar	2	Al-Amen Store	612-738-1684	HAWA
	ITAZ HADAR	2910 Pillsbury	Computers	651-8902369	12/16
+ 150	MOHAMED ALI	2910 Pillsbury	TAILOR	612-544-8000	Mohamed Ali
+ 147	LUL MOHAMMED	2910 Pillsbury	CLOTHING	612-997-8939	Lul Mohamed
	AMIR MOHAMMED	2910 Pillsbury	SHUKH SHOP	612-229 0263	Amir Mohamed
	KADROUSSA	2910 Pillsbury	SHUKH STORE	612 227 1457	Kadroussa
	AMINA TESSA	2910 Pillsbury	BAKERY	612 557 6080	Amina Tessa
	FATMA FATIMA ALI	2910 Pillsbury	BAKERY	952 649 0036	Fatima Ali
	AMAL MOHAMMED	2910 Pillsbury	SALES	614 288 9090	Amal Mohamed
2005 MVR	AMAL MOHAMMED	2910 Pillsbury	TAWAKAL STORE	612 556 7662	Amal Mohamed
	SHEKH ASAN	2910 Pillsbury	UNIVERSAL COMPUTER	612 250 9588	Shekh Asan
	KAR SHEKH ASAN	2910 Pillsbury	KARAMEL G FURNACE	612 490 3562	Kar Shekh Asan
	AL RAHMA STORE	2910 Pillsbury	AL RAHMA STORE	612 966 6860	Al Rahma Store
2010 OT 2016 GCM	FATMA KADROUSSA	2910 Pillsbury	AL RAHMA STORE	612 636 7698	Fatma Kadroussa
	WAPAKO TRAVEL	2910 Pillsbury	WAPAKO TRAVEL	612 353 9699	WapakO Travel
	MOUSTAPHE	2910 Pillsbury	People Transportation	952 220 9150	Moustaphe
	AL ISSA	2910 Pillsbury	Platinum Action	612 986 0703	Al Issa
	ABDULADIR DAKAR	2910 Pillsbury	SHUKH	612 886 3415	Abduladir Dakar
	AMAL MOHAMMED	2910 Pillsbury	OLYMPIA	612 308 0743	Amal Mohamed
	ZAKARIA ISMAIL	2910 Pillsbury	Karmel Market	612 245 5506	Zakaria Ismail
	Degan Fibril	2910 Pillsbury	Degouti Store	612 408 7556	Degan Fibril

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Name of Tenant/Business	Address	Type of Business	Phone Number	Signature
MAHDI MOHAMED	2940 PIL	Home Dish Tailor	612 419 8151	<i>[Signature]</i>
NAMIR DAYHA	2940 PILLSBURY	RETAIL	612-288-9080	<i>[Signature]</i>
LIBAN SHAKA	2940 PILLSBURY	BOREBAR	612-986-1156	<i>[Signature]</i>
OMAR MAHAMED	2940 PILLSBURY	DRY CLEANER	612 286 234 4773	<i>[Signature]</i>
DALI ALI SAMI	2940 PILLSBURY	HOLD SALE	612 876 8813	<i>[Signature]</i>
		BOUTIQUE STORE		
ALDI MAHAMED	2940 PILLSBURY	HABARUYNAL KAG	612 644 5066	<i>[Signature]</i>
DEEP ABDI	2940 PILLSBURY	ALFALHE SHOP	651 634 94 05	<i>[Signature]</i>
KARAMEL COFFEE	2940 PILLSBURY	KARAMEL COFFEE	612 886 5441	<i>[Signature]</i>
OSMAN ABO	2940 PILLSBURY	CLUBBING	651-757-6137	<i>[Signature]</i>
AHMED WARRAM	2940 PILLSBURY	TAX SERVICE	612 807 5490	<i>[Signature]</i>
ABDUL IBRAHIM	2940 PILLSBURY	BARBERA SHOP	612 418 2593	<i>[Signature]</i>
HALIM YASUC	2940 PILLSBURY	BARBERA SHOP	612 286 2081	<i>[Signature]</i>
HODAN ISSA	2940 PILLSBURY	CLOTHES FASHION	612 205 4422	<i>[Signature]</i>
IRADO KAHIN	2940 PILLSBURY	AL KASOKE	612 947 4752	<i>[Signature]</i>
UBAN DIRIC	2940 PILLSBURY	CLOTHING STORE	606 366 5086	<i>[Signature]</i>
MAHAMED ALDI	2940 PILLSBURY	SAFARI COFFEE	612 823 5367	<i>[Signature]</i>
ABDUL ABUKOR	2940 PILLSBURY	STREET SIKING	763 843 6669	<i>[Signature]</i>
ABDUL OSMAN	2940 PILLSBURY	STREET SIKING	612 429 8988	<i>[Signature]</i>
KADHO ABUKOR	2940 PILLSBURY	OMEL KODU	612 978 5394	<i>[Signature]</i>
LULE DOLE ALI	2940 PILLSBURY	CHINA FASHION	612 823 3273	<i>[Signature]</i>
Mohamed Mohamed	2940 PILLSBURY	DAY AL-SHARIF	952 215 8468	<i>[Signature]</i>

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